



# CREATING A SUSTAINABLE AND COMPREHENSIVE SOLUTION FOR CCPA COMPLIANCE

**How an efficient program paired with an optimal team provided the tools needed to comply with CCPA regulations on a scalable basis.**

## **BACKGROUND**

In efforts to prepare themselves for CCPA compliance, a leading multi-brand technology solutions provider kicked-off a program at the end of 2017—when the regulation was in the process of being finalized—to identify and assess their customer data. They required a solution that interpreted the regulation as it specifically related to their business and turned it into a functional program resulting in January 1, 2020 compliance.

As they continued to interpret the law and worked through the details required to implement new and optimized business processes, the solutions provider realized they were not satisfied with the level of service they were receiving from the project management and business analysis team who was helping them. As a result, they decided to make a change and hired Kenway, whom they had engaged in 2018 for another compliance related project (GDPR), early in 2019.

## **Industry**

Information Technology Services

## **Solution**

Data Privacy Regulation Implementation

## **Client Specific Detail**

This leading multi-brand technology solutions provider is a Fortune 500 firm and is a strong leader in the Information Technology Services space. They provide solutions to business, government, education, and healthcare clients in not only the US but also the UK and Canada.

## CHALLENGE

The solutions provider needed to prepare to comply with a new regulation (California Consumer Privacy Act) going into effect on January 1, 2020. The law is complicated to interpret, even more difficult to ensure compliance throughout the enterprise, and at high risk of continuous change. Whatever solution they decided to implement, they not only needed to develop a plan to comply with the law but needed to do so on a scalable basis.

The solution also needed to optimize efficiencies where possible to mitigate the need to hire additional staff to manually execute the tasks required for compliance. Furthermore, the solutions provider needed a program that would be flexible to enable easy adjustments in business processes to accommodate any changes to the CCPA regulation and potentially cover new regulations from additional states.

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We needed someone to help us sift through the noise and figure out what CCPA meant for IT. Kenway understood that compliance needed to be an evolving process instead of trying to apply a standard software development lifecycle. They worked with our cross-functional teams to keep them focused on the important changes needed for compliance.

–Director of Information Risk Management

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## SOLUTION

Kenway leveraged documentation from the solution provider’s legal counsel pertaining to how they interpreted the law as it specifically related to the solution provider and turned that into an actionable project plan. The plan was broken out into multiple workstreams to optimize focus and logically track tasks and issues.

## **LEGAL CONTENT:**

To ensure CCPA is accounted for in agreements with service providers and vendors, Kenway helped the legal team to build an inventory of contracts to be updated, assigned owners and target completion dates, and held the team accountable to deliver updated contracts on time.

## **DATA INVENTORY:**

To inform the Privacy Policy language as well as implementation response requests, Kenway finalized the inventory of personal identifying (PI) data and data mapping to build a full listing of data storage locations impacted by the CCPA regulation.

## **PROCESSING WORKFLOW:**

To collect, track responses, and build an audit trail for all requests received, Kenway defined an automated business process to track CCPA requests from initial submission via webform or 1-800 number throughout the verification and response processes which tracks progress, sends notifications to ensure responses are sent timely, and holds documentation to act as an audit trail.

## **PRIVACY NOTICES:**

To update all privacy notices to account for CCPA requirements, Kenway tracked the listing of privacy notices to be updated, worked with legal counsel to define the adjusted language, and managed the release of updated content with the web development team.

## **OVERSIGHT & CHANGE MANAGEMENT:**

Kenway supported the change management process through the creation and management of a communication plan as well as the creation of training tools. Additionally, the listing of controls was built and put into place to ensure ongoing compliance.

## **RIGHT TO**

### **DELETE:**

To build a process to delete upon request, Kenway leveraged the data mapping inventory and reconciled PI data to the corporate data retention policy. Based on the results, we led the appropriate parties through the analysis to determine the implications of deleting that personal data. We then led business analysis efforts to document requirements and work with the implementation team to build a process to delete and/or anonymize PI data.

### **ACCESS:**

To build Access and Knowledge reports to support request responses where appropriate, Kenway managed the process of documenting business requirements, working with technology on feasibility of the solution and implementing two key reports to provide information to the solution provider's customers on what categories of information and what information specifically the solution provider had about them.

### **OPT-OUT OF SALE OF DATA:**

To determine whether data is sold under definition of the ruling and build process to allow the consumer to opt-out if required, Kenway worked alongside technology and marketing resources and managed the process of identifying and documenting all customer information being collected by the solution provider to determine whether that data was sold or exchanged for anything of value.

## **ABOUT KENWAY**

Kenway Consulting is a management and technology consulting firm that empowers financial services companies to thrive in tomorrow's market by helping them with compliance and regulatory changes, data and analytics, technology implementations and transformations, and process improvements.